

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

DAVID E. MACK
Plaintiff,

vs.

UNITED RECOVERY SYSTEMS, LP
Defendant.

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Case No. 4:12cv303

JUDGE RON CLARK

Jury Demand

**DECLARATION OF JANET DEYOUNG IN SUPPORT OF DEFENDANT'S
RESPONSE IN OPPOSITION TO
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

On this day, December 20, 2012, I, Janet DeYoung, declare under penalty of perjury, as provided for by the laws of the United States, 28 U.S.C. §1746, that the following statements are true and correct.

1. My legal name is Janet DeYoung.
2. I have been an employee of United Recovery Systems, LP ("URS") since September 2010. My current position with URS is Compliance Manager.
3. URS's primary business purpose is the collection of debts.
4. Based upon my review of the records maintained by URS, the matters stated below are based on my own personal knowledge and review of URS's business records and if called upon I could and would competently testify thereto. The account notes are generated in the regular course of URS business and it is the regular course of URS business to make such records within a reasonable time of the transaction or occurrence indicated in the notes.
5. On April 16, 2008, American Express Co. referred Plaintiff's account to URS for collection. We don't know the time of day when the account was referred.
6. Subsequently on April 16, 2008, URS pulled Plaintiff's credit report for the purpose of collecting on the Plaintiff's account which was referred to URS for collection by the original creditor, American Express Co.
7. Plaintiff's credit report was obtained by URS subsequent to receiving Plaintiff's account for collection from American Express Co.
8. In 2008 URS attempted to contact David Mack on numerous occasions regarding the account placed by American Express for collections. David Mack never responded to any of URS' attempts to reach him regarding the American Express Account.

Executed on this day 20th of December 2012, in MARICOPA County, Arizona.


Janet De Young